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14 UNITED STATES DISTRICT COURT

15 DISTRICT OF NEVADA

16 ALLSTATE INSURANCE COMPANY,  
ALLSTATE PROPERTY & CASUALTY  
17 INSURANCE COMPANY, ALLSTATE  
INDEMNITY COMPANY, and ALLSTATE  
18 FIRE & CASUALTY INSURANCE  
COMPANY,

19 Plaintiffs,

20 v.

21 MARJORIE BELSKY, MD; MARIO  
22 TARQUINO, MD; MARJORIE BELSKY,  
MD, INC., doing business as INTEGRATED  
23 PAIN SPECIALISTS; and MARIO  
24 TARQUINO, MD, INC., DOES 1-100, and  
ROES 101-200,

25 Defendants.

26 AND RELATED CLAIMS

CASE NO. 2:15-cv-2265-MMD-CWH

STIPULATION TO INCLUDE  
GREENMAN GOLDBERG RABY &  
MARTINEZ INTO THE STIPULATED  
CONFIDENTIALITY AND PROTECTIVE  
ORDER (ECF NO. 49) FOR THE  
DISCLOSURE OF DOCUMENTS  
PURSUANT TO F.R.C.P. 45 SUBPOENA

2:15-cv-2265-MMD-CWH

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE  
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,  
3 and ALLSTATE FIRE & CASUALTY COMPANY (collectively referred to as the "Plaintiffs"), and  
4 the law firm of GREENMAN GOLDBERG RABY & MARTINEZ (non-party herein after referred to  
5 as "GGR&M") hereby stipulate and agree as follows:

6 1. Plaintiffs served GGR&M with a subpoena pursuant to F.R.C.P. 45 for the production  
7 of documents regarding communications and payments made by and between Law Firm and the  
8 Defendants during GGR&M's representation of certain clients in personal injury claims for which  
9 Plaintiffs paid on settlement on behalf of Plaintiffs' insureds.

10 2. GGR&M is aware that Plaintiffs have subpoenaed several law firms seeking the same  
11 type of information pursuant to Rule 45 in this case, as well as a companion sister-lawsuit *Allstate v.*  
12 *Shah, et. al. Case No. 2:15-cv-01786-APG-CWH* ("*Shah*").

13 4. GGR&M understands that this Court presides over both the instant matter as well as  
14 the *Shah* matter, and that this Court has ruled consistently in both these cases and ordered other law  
15 firms to produce the same type of documents request of GGR&M.

16 5. A stipulated confidentiality and protective order in this case entered between Plaintiffs  
17 and Defendants for the disclosure of confidential, sensitive or other protected information was  
18 approved by this Court on June 3, 2016. (ECF No. 49).

19 6. GGR&M was not a party to the stipulated confidentiality and protective order. (ECF  
20 No. 49).

21 7. In ordering compliance with Plaintiffs' subpoenas to other law firms, this Court also  
22 ordered that the confidentiality and protective order (ECF No. 49) be applied to those law firms.

23 8. In accordance with this Court's prior rulings both in this action and in the *Shah* matter,  
24 the parties hereby stipulate and agree that the protections and scope articulated in the Stipulated  
25 Confidentiality and Protective Order approved by this Court on June 3, 2016. (ECF No. 49) be  
26 extended in their entirety to cover GGR&M in its compliance with Plaintiffs' subpoena.

27 ///

28 ///

9. GGR&M will produce all documents responsive to the subpoena within ten (10) days of approval and entry of this Order by the Court.

IT IS SO STIPULATED.

Dated: \_\_\_\_\_

Dated: 1/7/19

McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

GREENMAN GOLDBERG RABY &  
MARTINEZ

By: 

DYLAN P. TODD, ESQ.

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By: 

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702-388-4476

**ORDER**

IT IS SO ORDERED.

DATED this 14 day of January, 2019.

  
UNITED STATES MAGISTRATE JUDGE

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